

DICKINSON WRIGHT PLLC

JUSTIN J. BUSTOS

Nevada Bar No. 10320

BROOKS T. WESTERGARD

Nevada Bar No. 14300

100 W. Liberty St., Ste. 940

Reno, NV 89501

(775) 343-7500

(844) 670-6009

Email: jbustos@dickinson-wright.com

Email: bwestergard@dickinson-wright.com

BRAUNHAGEY & BORDEN LLP

ANDREW LEVINE (*pro hac vice forthcoming*)

MATTHEW BORDEN (*pro hac vice forthcoming*)

DAVID KWASNIEWSKI (*pro hac forthcoming*)

351 California Street, 10th Floor

San Francisco, CA 94104

Tel: (415) 599-0210

Email: Levine@braunhagey.com

Email: borden@braunhagey.com

Email: Kwasniewski@braunhagey.com

Attorneys for Defendant Nature's Bakery, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TURKIYE IHRACAT KREDI BANKASI,
A.S.,

Plaintiff,

vs.

NATURE'S BAKERY, LLC F/K/A BELLA
FOUR BAKERY, INC.,

Defendant.

Case No. 3:20-cv-00330-LRH-CLB

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT
(First Request)

Defendant Nature's Bakery, LLC, and Plaintiff Turkiye Ihracat Kredi Bankasi, A.S., by
and through their respective counsel of record, stipulate and agree as follows:

1 1. Plaintiff filed its Complaint (ECF No. 1) on June 4, 2020.

2 2. The parties dispute the date of service. Plaintiff filed a sworn to Proof of Service
3 that indicates Defendant was served on June 8, 2020 (ECF No. 10). Assuming service occurred
4 on June 8, 2020, the deadline to respond to the Complaint was June 29, 2020.

5 3. Defendant, on the other hand, contends that service did not occur until June 10,
6 2020. Assuming service occurred on June 10, 2020, the deadline for Defendant to respond to the
7 Complaint is July 1, 2020.

8 4. On June 29, 2020, Defendant's counsel requested additional time to respond to
9 Plaintiff's Complaint because Nevada counsel has only recently been retained and counsel needs
10 additional time to fully research and evaluate the factual allegations in the Complaint before filing
11 Defendant's response to the Complaint.

12 5. On June 30, 2020, Defendant's counsel provided Plaintiff's counsel with an initial
13 draft of this stipulation. Through this process, the parties learned about the dispute regarding the
14 date of service.

15 6. On July 1, 2020, counsel for the parties further conferred about Defendant's
16 request for an extension of time and Plaintiff agreed to Defendant's request subject to an agreeable
17 stipulation filing.

18 7. It is Defendant's position that this Stipulation is timely filed based on a June 10,
19 2020, date of service.

20 8. However, assuming *arguendo* that service occurred on June 8, 2020, Defendant
21 respectfully submits that it has demonstrated excusable neglect by not submitting this stipulation
22 by June 29, 2020. *See* LR IA 6-1.

23 9. In light of the circumstances, the parties stipulate that Defendant may have up to
24 and including July 15, 2020, to respond to the Complaint.

25 10. This stipulation is being filed in good faith for the reasons stated above and not for
26 the purpose of delay.

11. This is the first stipulation between Plaintiff and Defendant to extend the time for responding to the Complaint.

Dated this 1st day of July, 2020.

DICKINSON WRIGHT PLLC

/s/ Justin J. Butos

JUSTIN J. BUSTOS

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Nevada Bar No. 14300

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Reno, NV 89501

(775) 343-7500

(844) 670-6009

jbustos@dickinson-wright.com

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(pro hac vice forthcoming)

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(pro hac vice forthcoming)

DAVID KWASNIEWSKI

(pro hac vice forthcoming)

351 California Street, 10th Floor

San Francisco, CA 94104

Levine@braunhagey.com

borden@braunhagey.com

Kwasniewski@braunhagey.com

Tel: (415) 599-0210

Attorneys for Defendant Nature's Bakery, LLC

Dated this 1st day of July, 2020.

BLUESTONE LAW, LTD.

/s/ Gabriel T. Bluestone

GABRIEL T. BLUESTONE *(pro hac vice)*

M. ZACHARY BLUESTONE *(pro hac vice)*

1717 K Street NW, Suite 900

Washington, D.C. 20006

(202) 655-2250

gfb@bluestonelaw.com

mzb@bluestonelaw.com

ERICKSON, THORPE & SWAINSTON,
LTD.

JOHN C. BOYDEN

Nevada Bar No. 3917

99 West Arroyo Street

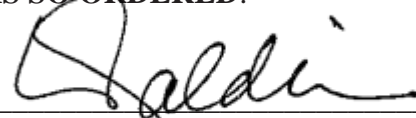
Reno, Nevada 89505

(775) 786-3930

jboyden@etsreno.com

*Attorneys for Plaintiffs Turkiye Ihracat Kredi
Bankasi, A.S.*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: July 2, 2020

CERTIFICATE OF SERVICE

I certify that I am an employee of DICKINSON WRIGHT, PLLC and that on this date, pursuant to Federal Rule of Civil Procedure 5(b), I am serving a true and correct copy of the attached **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** on the parties as set forth below:

XXX CM/ECF Electronic Notification addressed as follows:

John C. Boyden
ERICKSON, THORPE
& SWAINSTON, LTD.
99 West Arroyo Street
Reno, Nevada 89505
jboyden@etsreno.com

Gabriel T. Bluestone
M. Zachary Bluestone
BLUESTONE LAW, LTD.
1717 K Street NW, Suite 900
Washington, D.C. 200006
gtb@bluestonelaw.com
mzb@bluestonelaw.com

DATED this 1st day of July, 2020.

/s/ Cindy S. Grinstead
An Employee of DICKINSON WRIGHT PLLC